

Chapman Chemical Company

A KemaNobel Company

January 19, 1981



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Dept. of Environmental Quality

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JAN 26 1981

NORTHWEST REGION

City of Portland, Oregon
City Engineer
621 S. W. Alder Street
Room 912
Portland, OR 97205

ATTN: Mr. Harry G. Edmonds
Industrial Wastewater Management Section

Gentlemen:

Accompanying this letter is the completed Waste Analysis Report concerning Chapman Chemical Company's facility located at 10505 N. Macrum Avenue in Portland. We trust this report plus the information supplied in this letter and our previous letter of December 22, 1980 will provide all you need to approve our operating plan.

Because we have no operating history in Portland, the data given are necessarily based on similar operations now being conducted in our Memphis plant. We are proud of the results of our efforts to avoid generation of objectionable discharges, and of the attitudes we have instilled in our operating personnel. Please be assured that we have every intention of operating in the same responsible manner in Portland.

For your information, our Plant Superintendent in Portland is Mr. L. D. Carmon. He can be reached at 286-9639. Doug was a manufacturing foreman in the Memphis plant prior to this assignment and is fully aware of our operating practices and corporate attitude toward responsible operation. He should be your prime contact person. He can reach the Memphis office through our **WATS telephones**, and I am prepared to come to Portland for any meetings where my presence may be advisable or to send an engineer from Memphis to participate.

Regarding the surface water runoff mentioned in your January 5 letter, it is my understanding that the previous owners elected to direct runoff from this large area to the sewer as a tradeoff against the possibility of spills or contaminated runoff from uncontained bulk storage tanks going directly to the slough north of the property. Those tanks have now been removed, and we have no immediate plans to erect above-ground tanks outside the small area surrounded by a containment dike. Therefore, I propose that we will move as soon as possible to re-direct the surface runoff from most of the area to surface drainage. However,

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City of Portland, Oregon

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as a part of our spill-containment plan, we would like to continue to drain the surface along the spur track west of the diked area to the trap basin. It is estimated that this would reduce the unroofed area draining to the sewer to about 4,000 square feet.

Should we find it necessary to add more above-ground tanks in the future, they will be properly diked so there should be no need to return to the present system of diverting runoff from large paved areas to the sewer.

It is important to us to begin operation within the month of February because we have discontinued using a contract blending facility which was supplying a large portion of our regional needs. We look forward to your prompt and positive response.

Sincerely,

CHAPMAN CHEMICAL COMPANY



W. A. Singleton
Director of Manufacturing

WAS/pap

Attachments

cc: Oregon Dept of Environmental Quality ✓
P.O. Box 1760
Portland, OR 97207
Attn: Mr. Steve Carter

WASTE ANALYSIS REPORT TO CITY OF PORTLAND, OREGON
FOR
CHAPMAN CHEMICAL COMPANY, 10505 N. MACRUM AVENUE

EXHIBIT A

Potential for Generation of Liquid Wastes

Chapman Chemical Company's operation in the Portland plant will be of a type which generates no liquid waste stream. The plant will function as (a) a regional warehouse and distribution center, and (b) a blending facility.

The blending operation will consist of blending certain Chapman products and packaging them in shipping containers or shipping directly in tankcars or tank-trucks.

Products will be blended in equipment dedicated to groups of products which are mutually compatible, eliminating the need for washout between products. Packaging and shipment will be conducted either directly from the blending vessels or from dedicated bulk storage tanks, eliminating the need for flushing of pipelines.

All formulas have been designed so that the few simple reactions (neutralization of an acid, for example) are done "in situ" as the product is prepared so that all reaction products remain as either active or inert ingredients of the finished product.

As a general rule, the blending operation required mild heating to speed dissolution of the ingredients, but little or no cooling.

The products to be manufactured in the Portland plant within the foreseeable future fall into three categories:

1. Wood preservative solutions consisting of pentachlorophenol dissolved in appropriate organic solvents.
2. Water-dilutable concentrates for preparing solutions used by sawmills to prevent fungal action on the surfaces of freshly sawn lumber. These concentrates contain anti-fungal agents such as alkali salts of chlorinated phenols or organic copper compounds in an aqueous base.
3. Sealing or water-repellent coatings for smooth-surfaced lumber consisting of wax-in-water emulsions, some of which are pigmented.

The blending methods to be used have been in use in our Memphis, Tennessee plant for a number of years with excellent success in preventing the generation of waste streams. The superintendent of the Portland operation has the benefit of this experience, having been transferred from the Memphis plant. The data

presented in Paragraphs "F" and "G" of Section II of this report are based on our experience in Memphis operation. Because operation of the Portland plant has not begun, no such figures are yet available for this location. Because of the smaller scope and limited group of products to be prepared in Portland, we expect that our performance will be at least as good as in Memphis. Because we have very low levels of organic matter in the streams in Memphis, we are monitoring and reporting Chemical Oxygen Demand (COD) on a regular basis, rather than BOD. In the rather infrequent checks we have made over the last three years, the five-day BOD of this waste has been in the range reported in Paragraph "G".

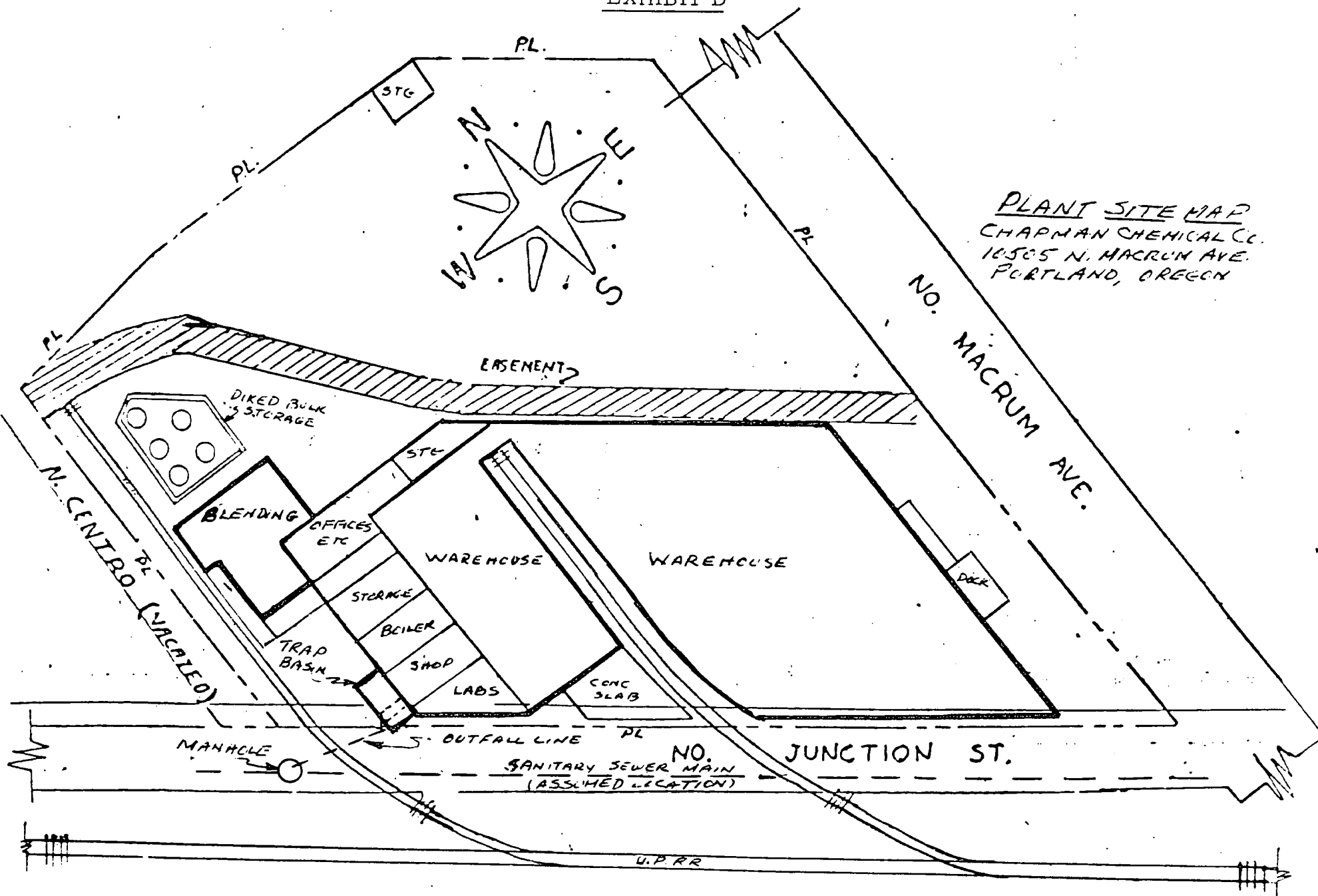
To summarize, the potential sources from which contaminated water might reach the sewer system are:

1. Normal housekeeping such as floor washdowns in manufacturing areas.
2. Occasional rinses of small tanks used for pigmenting emulsion coatings.
3. Accidental spills of a liquid product or a raw material.

Chapman's Memphis experience demonstrates that the contaminants introduced into the sewer system by the first two of these sources, following our normal practices is insufficient to exceed any limits imposed by Portland Sewer Regulations. The presence in our facility of a large (approximately 30,000 gallon) trap chamber intercepting all floor drains and other possible spill points gives ample opportunity to contain any spills until the contaminants can be recovered, neutralized or otherwise properly disposed of prior to reaching the City sewer system.

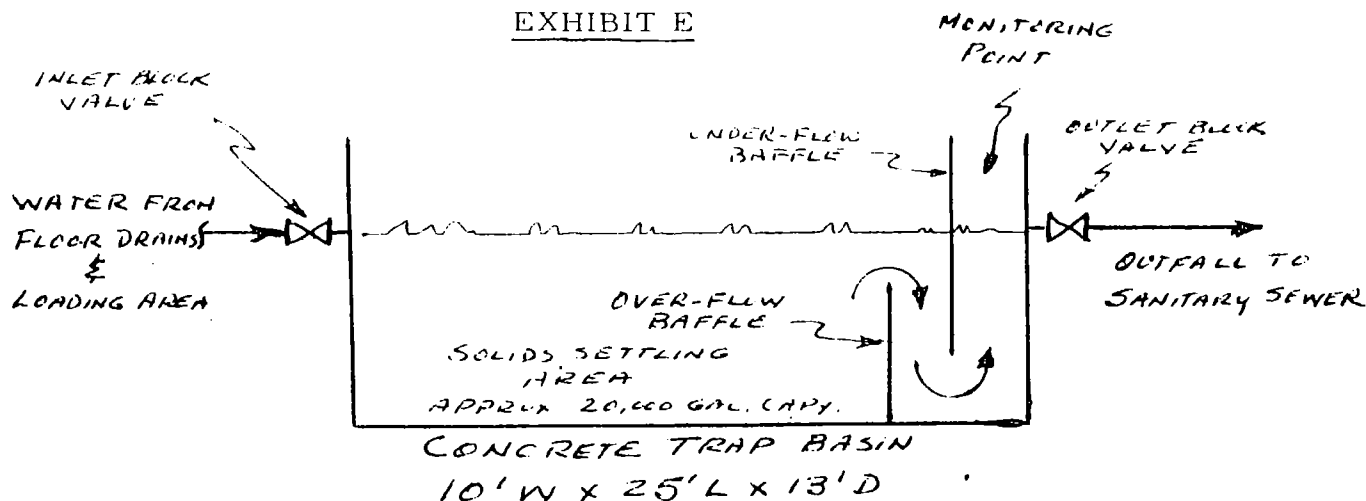
WASTE ANALYSIS REPORT TO CITY OF PORTLAND, OREGON
FOR
CHAPMAN CHEMICAL COMPANY, 10505 N. MACRUM AVENUE

EXHIBIT D



WASTE ANAL() REPORT TO CITY OF PORTLAND, OREGON
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EXHIBIT E



Normal Operation Procedure:

1. Both block valves open.
2. As water flows through, velocity drops and settleable solids settle out in first chamber; floatable material remains behind underflow baffle.
3. Surface is inspected daily and skimmed as necessary.
4. Trap is periodically pumped out and solids are removed for proper disposal.
5. Periodic samples taken at point indicated for monitoring.

Emergency Spill Procedure:

1. Outlet block valve closed immediately.
2. Inlet block valve left open until all contaminant material has finished draining to basin.
3. Inlet block valve closed to prevent further entry of waste until contaminants have been removed.
4. Inspect contents, analyze if necessary, remove contaminant as completely as possible.
5. Notify authorities, consult with them as to extent of further treatment of remaining contents. Comply with their instructions prior to resuming operation.

SCHEMATIC DIAGRAM & OPERATING PROCEDURE - WASTE TRAP BASIN

CHAPMAN CHEMICAL COMPANY
MEMPHIS, TENNESSEE

PORTLAND PLANT

Exhibit 4

Plant History

- 1953 - Purchased by Adhesive, Resin, & Chemical Division, American-Marietta Company.
- 1954 - Plant remodeled. Work consisted of removing outmoded resin reactor and relocating process piping.
- 1957 - Installed one additional 3,000 gallon reactor and additional storage facilities.
- 1961 - Martin Marietta Corp. formed by merger of American-Marietta Company and Martin Company.
- 1962 - Chemicals Division of Martin Marietta Corp. including the Portland plant sold to United Pacific Corp. as Pacific Resins & Chemicals, Inc.
- 1966 - VWR United Corporation formed by merger of United Pacific Corporation and Van Waters & Rogers. Pacific Resins & Chemicals, Inc. continued as a subsidiary of the new corporation.
- 1966-
1967 - A new 10,000 gallon reactor and supporting facilities such as steam boiler, cooling tower, and additional storage tanks were added.